

Jakub Madej
415 Boston Post Rd, Ste 3-1102
Milford, CT 06460
Phone: 203-928-8486
Fax: 203-902-0070

Plaintiff appearing in person

REED SMITH LLP

Amy Secter, Esq.
Riverfront Plaza-West Tower
901 East Byrd Street, Suite 1900
Richmond, VA 23219-4068
Phone: +1 804 344 3400
Fax: +1 804 344 3410

*Attorneys for Defendant Synchrony Bank
(improperly named as Synchrony Financial)*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Jakub Madej,

Plaintiff,

v.

Synchrony Financial.

Defendant.

Civil Action No. 1:21-cv-01894 (WFK) (SJB)

JOINT REQUEST FOR CONTINUANCE OF THE MEDIATION DEADLINE

Plaintiff Jakub Madej (“Plaintiff”) and Defendant Synchrony Bank¹ (“Defendant”) (collectively, the “Parties”) submit the below Joint Request for Continuance of the Mediation Deadline following their conferral and agreement regarding the Court ordered mediation and the retention and scheduling of a mediator:

¹ It is Synchrony’s position that an improper name has been used to name Synchrony as the Defendant and that Synchrony Bank, instead of Synchrony Financial, is the more appropriate name for Defendant. Plaintiff has not agreed to any amendment or substitution of Defendant and does not agree that Defendant has been improperly named.

1. On August 12, 2021, the Parties met and conferred to propose and discuss potential mediators for this matter, as provided by the Court's list of approved mediators.

2. The Parties agreed to request Retired Judge Steven M. Gold, formerly of the Eastern District of New York, to mediate their dispute in accordance with Local Rule 83.8.

3. On August 16, 2021, the Parties were informed that Judge Gold was available for mediations starting in November 2021.

4. Based on the schedules and availabilities of the Parties and Judge Gold, the Parties agreed to the soonest agreeable date of November 4, 2021 to conduct a mediation.

5. The Parties have conveyed to Judge Gold a description of the matter, who will attend the mediation, how the mediation will be conducted, and division of the fees and costs associated with the mediation.

6. The Parties are interested in trying to resolve this matter without further litigation or Court involvement, to that end the Parties request the Court continue the October 8, 2021 mediation deadline set by the Court's August 2, 2021 Order. The Parties request the Court continue the mediation deadline to November 4, 2021, or after, to facilitate the Parties attempts to mediate resolution of this matter.

Dated: September 1, 2021

By: /s/Jakub Madej
Jakub Madej

Pro-Se Plaintiff

REED SMITH LLP

By: /s/ Amy Sector
Amy Sector, Esq.
Riverfront Plaza-West Tower
901 East Byrd Street, Suite 1900

Richmond, VA 23219-4068
Phone: +1 804 344 3400
Fax: +1 804 344 3410

*Attorneys for Defendant Synchrony Bank
(Improperly named as Synchrony Financial)*